

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-39 are currently pending. Claims 1, 3, 4, 21, and 34 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claim 2 was rejected under 35 U.S.C. § 112, second paragraph, regarding the term “substantially identical.”¹ Claims 1-4, 7, 10, 11, 20-24, and 30-36 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,983,237 to Jain et al. (hereinafter “the ‘237 patent”); Claims 5, 6, 8, 9, and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘237 patent in view of U.S. Patent No. 5,754,938 to Herz et al. (hereinafter “the ‘938 patent”); and Claims 12-18, 25-29, and 37-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘237 patent in view of U.S. Patent Application Publication No. 2002/0138487 to Weiss et al. (hereinafter “the ‘487 application”).

Regarding the rejection of Claim 2 under 35 U.S.C. § 112, second paragraph, regarding the term “substantially identical,” Applicants note that this term is not recited in Claim 2, but in Claim 3. However, Applicants note that Claim 3 has been amended to no longer recite the term “substantially identical.” Accordingly, Applicants submit that the rejection of the claims under 35 U.S.C. § 112, second paragraph, is rendered moot by the present amendment to the claims.

Amended Claim 1 is directed to an information retrieval system in which a set of distinct information items map to respective nodes in a self-organizing map by mutual similarity of the information items, so that similar information items map to nodes at similar

¹ Applicants note that the term “substantially identical” appears in Claim 3, not Claim 2.

positions in the self-organizing map, the system comprising: (1) a user control for defining a search criteria and for selecting information items; (2) a detector for detecting those positions within the self-organizing map corresponding to the selected information items; (3) a graphical user interface for displaying display points representing those positions within the self-organizing map corresponding to the selected information items; and (4) a processor, responsive to the selected information items defined by the search criterion, for providing one or more representations representative of the information content of the selected information items. Claim 1 has been amended to recite a self-organizing map, rather than an array of nodes. The changes to Claim 1 are supported by the originally filed specification and do not add new matter.²

The '237 patent is directed to a visual query processing method including the steps of providing a user query; applying the user query to a visual dictionary that includes a plurality of feature vectors so as to generate a set of query vectors; and applying the query vectors to an image database comprising a plurality of images so as to provide a list of similar images. Further, the '237 patent discloses a set of queries based on descriptors of images to search a database, wherein the descriptors are compared with stored descriptors and are judged to see if they are within a "ball park" approximation of the feature region.³ Further, the '237 patent discloses that different comparisons with different descriptors count as a query and the results are added together to find the best matches in the visual dictionary. Thus, the '237 patent discloses the use of selected, separate, and direct comparisons for different features of an image. However, Applicants respectfully submit that the '237 patent fails to disclose an information retrieval system in which a set of distinct information items mapped to respective nodes in a self-organizing map by mutual similarity of the information items, and a detector for detecting those positions within the self-organizing map corresponding to selected

² See, e.g., Figure 5 and the discussion related thereto in the specification.

³ See the ellipsis shown in Figures 6 and 7. See also the '237 patent, column 7, lines 10-23 and column 10, lines 45-58.

information items. Accordingly, Applicants also respectfully submit that the '237 patent fails to disclose a graphical user interface for displaying points representing those positions within the self-organizing map corresponding to the selected information items, as recited in amended Claim 1. The '237 patent uses multiple queries and does not disclose a self-organizing map. Accordingly, Applicants respectfully submit that the rejection of Claim 1 (and all similarly dependent claims) is rendered moot by the present amendment to Claim 1.

Independent Claims 21 and 34 recite limitations analogous to the limitations recited in Claim 1. Moreover, Claims 21 and 34 have been amended in a manner analogous to the amendment to Claim 1. Accordingly, for reasons analogous to the reasons stated above for the patentability of Claim 1, Applicants respectfully submit that the rejections of Claims 21 and 34 (and all similarly rejected dependent claims) are rendered moot by the present amendment to Claims 21 and 34.

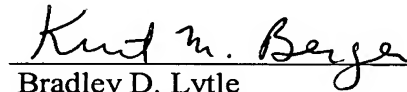
Regarding the rejection of dependent Claims 5-9, 12-19, 25-29, and 37-39 under 35 U.S.C. § 103, Applicants respectfully submit that the '938 patent and the '487 application fail to remedy the deficiencies of the '237 patent, as discussed above. In particular, Applicants note that the '938 patent discloses the hierarchical clustering of documents according to relative word frequency. However, Applicants respectfully submit that the '938 patent is completely silent regarding the use of self-organizing maps. Further, Applicants note that the '487 application discloses hierarchical clustering of websites according to common features, and discloses the presentation of labeled continents and countries, the size of which are proportional to the number of websites deemed relevant to the user's search query. However, Applicants respectfully submit that the '487 application is completely silent on the use of self-organizing maps. Accordingly, Applicants respectfully submit that the rejection of dependent Claims 5-9, 12-19, 25-29, and 37-39 are rendered moot by the present amendment to the independent claims.

Thus, it is respectfully submitted that independent Claims 1, 21, and 34 (and all associated dependent claims) patentably define over any proper combination of the '237 patent, the '938 patent, and the '487 application.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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